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GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENT
LANSING



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DIRECTOR

October 12, 2010

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US EPA RECORDS CENTER REGION 5



Dear Mr. Borries and Mr. Saric:

SUBJECT: Former Plainwell Impoundment Time Critical Removal Action Mid-Channel Prism
Volume Remaining and Completion of Bathymetry Survey Activities

On September 30, 2010, the United States Environmental Protection Agency (U.S. EPA) approved discontinuing the bathymetric monitoring that had been occurring in the Former Plainwell Impoundment area as required by Section IX, Paragraph 33 (specifically Section 3.4.5 of the Appended Work Plan) of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study. The following comments identify the Michigan Department of Natural Resources and Environment (DNRE) concerns with the bathymetry data collected thus far for the Plainwell Impoundment and why continued bathymetric monitoring is necessary and appropriate.

The bathymetric monitoring data, as well as recent site observations, bring into question basic issues related to the fate of the remaining un-eroded in-stream sediment material and the objective of achieving a stable river channel. These issues, discussed in more detail below, make a continued bathymetric monitoring program necessary to effectively/fully evaluate channel evolution.

Two separate provisions in the Administrative Settlement Agreement and Order on Consent for Removal Action (ASAOC for Removal) provide the basis for requesting additional bathymetric monitoring of the remaining liable party.

First, in Section VIII, WORK TO BE PERFORMED, of the ASAOC for Removal states that the expected actions generally include:

"g. monitoring during the implementation of the Work and for three years subsequent to receipt of U.S. EPA's Notice of Completion of Work pursuant to Paragraph 77; . "

Second, in the undated Enforcement Action Memorandum found in Appendix 1 to the ASAOC for Removal Action, Section V., A. states in part.

"(10) Finally, the response action shall ensure that a stable river channel exists post-removal, re-vegetation with native plant species occurs, and that appropriate monitoring is performed both during and after the response action."

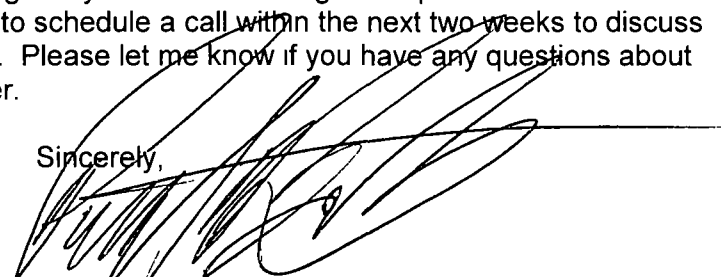
Several large areas of sediment have not eroded at all immediately upstream of the Former Plainwell Dam and currently breach the water surface during low flow conditions. The inconsistent loss of mid-channel material that has been identified in the bathymetry work impacts channel flow and may impact channel stability into the future.

In addition to the issue of monitoring the erosion of the post-dam related fine sediments, the bathymetry surveys highlight another issue. Specifically, it has identified the erosion of the pre-dam, parent bed material. Several of the transects, especially transects 3, 5, and 9, show substantial downcutting of the channel below the parent bed material, which suggests that channel degradation may be occurring. Channel degradation in the form of downcutting is not consistent with the objective of achieving a stable channel and may lead to future bank failure if degradation is severe enough.

As the channel stability objective for the removal has yet to be achieved, and because the action is still within the three years of post construction completion monitoring, continued monitoring of channel degradation and/or aggradation is necessary to evaluate basic principles of channel stability. The collection of additional bathymetric data, given the observations of inconsistent sediment erosion and channel downcutting, are a necessity. Additionally, this proposed data collection is consistent with the charge included in the U.S. EPA's September 30, 2010, letter requiring that "the volume and concentrations of this remaining material must be addressed in the Area 1 SRI [Supplemental Remedial Investigation] Report, as well as [in] the Feasibility Study Report for consideration of future actions."

The bathymetry surveys indicate that an ongoing monitoring program is needed to observe and document potential channel instability. The DNRE looks forward to discussing the monitoring program it sees as critical for the remaining two years of monitoring in the post construction completion phase. The DNRE would like to schedule a call within the next two weeks to discuss the issue of monitoring with the U.S. EPA. Please let me know if you have any questions about the technical issues discussed in this letter.

Sincerely,



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Project Manager
Specialized Sampling Unit
Superfund Section
Remediation Division
517-373-8174

Mr. Samuel Borries
Mr. James Saric

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October 12, 2010

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